

JULY 22, 2020

Judge James K. Bredar, Chief Judge
U.S. District Court of Maryland
101 West Lombard St./Chambers 3D
Baltimore, Maryland 21201

FILED
LOGGED

ENTERED
SERIALIZED

SUBJECT: PETITION TO IMPANEL
A SPECIAL GRAND JURY

JUL 27 2020

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

Dear Honorable Judge Bredar:

BY

DEPUTY

Acting as my own attorney, and former candidate for the Office of President of the Baltimore City Council in the June 2, 2020, Presidential Primary Election; I do hereby petition you to authorize the impaneling of a Special Grand Jury to investigate the systemic policies, patterns, practices, and procedures of alleged misconduct arising from the failures of the State of Md. and Baltimore City Boards of Election to fairly administer and perform their fiduciary responsibilities to the Electorate.

In addition, I pray that you direct the U.S. Attorney for the District of Md., Robert K. Hur to investigate the following stipulated allegations of misconduct pursuant to a Special Grand Jury rendering a probable cause determination or finding of Civil/Voting Rights violations, Gross Negligence, Malfeasance, Non-Feasance, Criminal Acts of Voter Suppression, and/or No Bill:

1. In April 2016, the Baltimore City Primary Election was Decertified due to numerous City Election Board irregularities. Mr. Hassan Giordano spokesperson for the Activist Group "Voice" demanded that State and City Board Officials be held accountable.

A. Sunpaper Reporter, Luke Broadwater wrote articles highlighting the State Board of Elections' precinct level review of irregularities in the Balto. 2016, April Primary Election including a failure to analyze 80 or more provisional ballots.

B. Ms. Linda H. Lamone, Administrator for the State Board of Elections stated that the number of ballots counted in the April 26, 2016, Primary Election was one hundred more than the number of voters who checked-in ~~at the Polling Places~~ at the Polling Places prompting the unprecedented Decertification result.

2. The Balto. City Board of Elections has consistently maintained a systemic pattern and practice of Non-Feasance (a poor record of voter registration); and a flagrant disregard of numerous requests to establish an Early Voting Site in the West Balto. City Demographic encompassing an 80% Black Population in zip codes 21215 (below Northern Parkway), 21216, and 21217. The socio-economic conditions arising from the imposition of Institutional Racism upon registered and prospective voters in the aforesaid zip codes include extreme poverty, food deserts, homelessness, massive unemployment, and violent crime borne of record-breaking Drug Trade related murders. Voter Suppression is by design.

Dr. Marvin L. Cheatham, Election law Consultant and Civil Rights Leader lives in the 21216 zip code, and should be interviewed should you allow this requested investigation to go forward.

3. On June 3,2020, Balto. City Election Board Director, Armstead Jones arbitrarily and capriciously suspended the counting of all voter balloting results in the June 2,2020, Presidential Primary Election; citing the misprinting of ballots for the 1st Councilmanic District as justification for his actions. He also acknowledged that 80 plus provisional ballots were never analyzed.
 - A. More than 20,000 ballots were returned to the Balto. City Board of Elections as non-deliverables due to the Gross Negligence of Board Officials to predetermine correct addresses.
 - B. An out-of-state vendor was not required to mail elections ballots to City Voters in a timely fashion. Some voters never received their ballots.
4. On June 3,2020, Lieutenant Governor Boyd Rutherford demanded the resignation of Ms. Linda H. Lamone, Administrator of the State Board of Elections after his previous warnings to correct systemic failures were ignored.
5. On June 3,2020, State Comptroller Peter Franchot called for the resignation of Armstead Jones, Director of the Balto. City Board of Elections.
6. Governor Larry Hogan ~~demanded~~ demanded submission of a written report from Ms. Linda H. Lamone detailing the reasons for the alleged misconduct and incompetencies of the State Board of Elections to be submitted to him on/or before July 3,2020.

Conclusion: All three of the aforesaid Government Officials are material witnesses with E-Mails and verbal communications with Boards of Election Officials germane to the alleged Violations of Public Trust(Malfeasance) inflicted upon the Electorate.

There are too many conflicts of interest preventing the Maryland Judicial and Political Establishments from objectively and impartially reforming the State and City Boards of Election policies, practices, and procedures. Federal intervention is an absolute necessity if we're to hold our Election Officials accountable.

Your Honor, I ask your expeditious response to this petition for justice, decency, and fairplay.

Thank you for your time and consideration.

Notes: See attached Certificate
Candidacy

Honorary ~~Dean~~ Doctorate of Law
Degree Awarded December 2015
Morgan State University

Sincerely,

Leo W. Burroughs Jr.
Dr. Leo W. Burroughs, Jr.
Cell; 443-651-2578
Home: 410-5236118

LWB Jr.

CC: Honorable Robert K. Hur
U.S. Attorney District of Md.

State of Maryland - Certificate of Candidacy

2020 Presidential Primary Election

Name to Appear on Ballot	Leo W Burroughs		
Name as Registered for Voting	LEO W BURROUGHS		
Name for Results	Burroughs, Leo W		
Office Sought	President of the City Council		
District/Circuit	BALTIMORE CITY		
Jurisdiction of Office	Baltimore City		
Residential Address	301 MCMECHEN ST APT 504, BALTIMORE, MD 21217-0000		
Mailing Address	301 Mcmechen St Apt 504, Baltimore, MD 21217 0000		
Contact Phone	(443) 651-2578	Public Phone	(443) 651-2578
Email		Fax	
County of Residence	Baltimore City		
Election District and Precinct	14002	Party Affiliation	DEMOCRAT
Date of Birth	3/11/1942	Gender	M
Candidate URL		Facebook	
Twitter		Other Social Media	

I have carefully reviewed the information above and affirm that it is correct and accurate.

I, LEO W BURROUGHS, am filing for the office of President of the City Council, in BALTIMORE CITY and request that my name appears as, Leo W Burroughs, on the official Presidential Primary ballot to be used in the 2020 PRESIDENTIAL PRIMARY ELECTION on April 28, 2020 as a candidate seeking the nomination of the DEMOCRATIC Party.

I hereby certify under the penalty of perjury that the following is true:

- > The ballot name listed above is my legal name or a name supported by an affidavit filed at this time under penalty of perjury.
- > I will not be a candidate for any other public office.
- > I am not a treasurer or campaign manager for any candidate or Maryland political committee.
- > I am a registered voter and a citizen of Maryland and meet all the requirements for the above listed office.
- > I understand that my signature authorizes the board of elections to change my voter registration record to the information provided above.
- > I understand that final acceptance of this certificate depends upon verification of the information provided by me.
- > If filing as a state or local candidate, I have an active authorized candidate campaign committee.
- > I am in compliance with all campaign finance reporting requirements under Title 13 of the Election Law Article.
- > The filing fee for the above-mentioned office has been paid.

January 8, 2020
Date of this Certificate

Leo W Burroughs
Signature of Candidate

Subscribed and sworn before me this 8th day of January 2020

For Board Use Only	
<input checked="" type="checkbox"/> Financial Disclosure	
<input checked="" type="checkbox"/> Statement of Organization	
<input checked="" type="checkbox"/> Filing Fee	

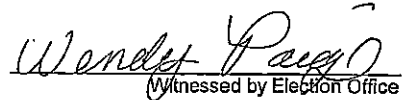
Wendy Fager
Witnessed by Election Office

Candidate Filing Receipt

This document is to certify that on 01/08/2020, LEO W BURROUGHS filed the necessary documents and paid the applicable fee to appear on the 2020 Presidential Primary Election Ballot as a candidate of the Democratic Party for President Of The City Council in BALTIMORE CITY.

Your ballot name will show as Leo W Burroughs.

Please notify this office immediately if there are any changes to your filed information within one week of the Certificate of Candidacy deadline.


Witnessed by Election Office

Payment Receipt

Candidate Name LEO W BURROUGHS

Jurisdiction of Filing Baltimore City

Office Sought President of the City Council

District or County BALTIMORE CITY

Candidate Campaign 301 Mcmechen St Apt 504
Contact Information Baltimore, MD 21217 0000
Address

Amount received \$150.00

Payer Name Leo Burroughs

Form of Payment Cash

Payment Received By Paige, Wendy

Candidate Filing Date 01/08/2020